

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

G.S., et al.,

Plaintiffs,

v.

Case No. 2:21-cv-02552-SHL-atc

GOVERNOR BILL LEE, in his official
capacity as GOVERNOR OF TENNESSEE,
SHELBY COUNTY, TENNESSEE,

Defendants.

**PLAINTIFFS' MOTION FOR LEAVE TO FILE A REPLY
AND EXTENSION OF PAGE LIMIT**

Plaintiffs G.S. et al. hereby file this Unopposed Motion for Leave to File a Reply to Defendant's Response to Plaintiff's Motion for Attorney's Fees and Costs and Extension of Page Limit. In support, Plaintiffs state as follows:

1. On September 3, 2021, the Court entered a TRO in favor of the Plaintiffs and enjoining Defendant Gov. Bill Lee's Executive Order 84. (Doc. 34). After a hearing, the Court entered a Preliminary Injunction on September 17, 2021. (Doc. 62).
2. Governor Bill Lee then abandoned a subsequent interlocutory appeal on December 10, 2021. (Doc. 97).
3. On December 23, 2021, Plaintiffs moved for an award of attorney's fees and costs as authorized by the ADA and Section 504 of the Rehabilitation Act. (Dkt. 101).
4. Defendant Gov. Lee filed its Response in Opposition to Plaintiffs' Motion on January 13, 2022. (Dkt. 107).

5. Plaintiffs now seeks leave to file a Reply brief in order to respond to the issues and challenges raised by Defendant Lee in its Response. Further, Plaintiffs seek an additional four pages of length for the reply brief in addition to the 5 pages permitted by the Local Rules.

6. Plaintiffs have consulted with Defendant's counsel, and Defendant's counsel states that he does not object to Plaintiffs' filing of a reply brief or the extension of the page limitation.

Accordingly, Plaintiffs ask for leave to file a Reply brief of 9 pages of briefing, not including the signature page.

Respectfully Submitted,

DONATI LAW, PLLC

/s/Bryce W. Ashby
Bryce W. Ashby—TN Bar #26179
Brice M. Timmons—TN Bar #29582
Craig A. Edgington—TN Bar #38205
1545 Union Avenue
Memphis, TN 38104
Phone: 901.278.1004
Fax: 901.278.311
bryce@donatilaw.com
brice@donatilaw.com
craig@donatilaw.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I certify that this Motion was served upon counsel of record for the Defendants, through the Court's ECF filing system on January 19, 2022.

/s/Bryce W. Ashby

CERTIFICATE OF CONSULTATION

I hereby certify that I have consulted with counsel for Defendant, Jim Newsom, who states that he does not oppose Plaintiffs' motion.

/s/Bryce W. Ashby